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August 24, 2020

The Honorable Andrew L. Carter, Jr.
U.S. District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007
VIA ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 8/31/20

Re: *United States v. Dennis McDonald*, et. al, 19-cr-828 (ALC)

Dear Judge Carter,

I am CJA counsel to Dennis McDonald in the above-captioned matter. I submit this letter to apply for the Court's authorization to obtain necessary services pursuant to the Guidelines for Administering the CJA and Related Statutes, Chapter 3 CJA Guidelines §320.70.40, Computer Hardware, Software or Litigation Support Services. I make this request to permit Mr. McDonald the opportunity to review the voluminous electronic discovery in this matter. Mr. McDonald is currently on home incarceration and does not own a computer. Due to the current COVID-19 pandemic, I am unable to review all of the discovery with Mr. McDonald in person. I have conferred with the Government about this request and the Government has no objection.

We are requesting that a laptop and portable hard drive be purchased pursuant to CJA Guideline 320.20.40. Those costs would be between \$50 and \$100 for the external hard drive and between \$500 and \$600 for the laptop. Both items would be sent to Mr. McDonald for his review. All purchased hardware would be turned over to the National Defender Services Support Team upon completion of the case, as required under the CJA guidelines.

Mr. McDonald is requesting the authority to purchase the computer hardware under the Criminal Justice Act. Should the Court decide to grant the application, please advise so that an application can be filed pursuant to the Criminal Justice Act eVoucher system.

Respectfully submitted,

_____/s/____

Matthew Galluzzo

Cc: AUSA Ryan B. Finkel and AUSA Mary Elizabeth Bracewell, via ECF

**The application is GRANTED.
So Ordered.**

Andrew L. Carter 8/31/20